MINTZ & GOLD LLP

ATTORNEYS AT LAW

600 THIRD AVENUE 25TH FLOOR New York, New York 10016

> TELEPHONE (212) 696-4848 FACSIMILE (212) 696-1231

www.mintzandgold.com

USDC SDNY DOCUMENT ELECTRONICALLY FILED DATE FILED: 12/16/2019

SENIOR COUNSEL

JACK A. HORN NOREEN E. COSGROVE MATTHEW S. SEMINARA TIMOTHY J. QUILL, JR. JULIA B. MILNE

OF COUNSEL

HONORABLE VITO J. TITONE (dec.) (NY State Court of Appeals 1985-1998) HARVEY J. HOROWITZ (dec.) HONORABLE HOWARD MILLER (NY Appellate Div. 1999-2010 [ret.]) **AMIT SONDHI*** ERIC M. KUTNER NEAL M. GOLDMAN ANDREW P. NAPOLITANO*

November 13, 2019

*ADMITTED TO PRACTICE ONLY BEFORE ALL COURTS IN NEW JERSEY AND ALL FEDERAL COURTS IN NEW YORK CITY

*ALSO ADMITTED IN NEW JERSEY

Via ECF

Hon. Lorna G. Schofield United States District Court 40 Foley Square New York, New York 10007

United States v. Sholom Muratov

17 Cr. 262 (LGS)

Sholom Muratov ("Defendant") respectfully requests that this Court issue an Order granting him leave to proceed in forma pauperis. As set forth in the attached Affirmation, Defendant can no longer afford the costs associated with the pursuit of his appeal, including filing fees, transcript orders, and attorneys' fees.

STEVEN W. GOLD

ELLIOT G. SAGOR

STEVEN A. SAMIDE

CHARLES A. ROSS**

KEVIN W. GOERING

KEVIN M. BROWN

HEATH LORING

PETER GUIRGUIS TIMOTHY H. WOLF**

ADAM K. BRODY

MARIA EVA GARCIA* GABRIEL ALTMAN ANDREW E. STECKLER ALEX J. OTCHY* CECE M. COLE

RICHARD M. BRESLOW

ALEXANDER H. GARDNER

ANDREW R. GOTTESMAN RYAN W. LAWLER*

TERENCE W. McCormick

ROBERT B. LACHENAUER ROGER L. STAVIS

IRA LEE SORKIN

SCOTT A. KLEIN

LON JACOBS

ALAN KATZ

STEVEN G. MINTZ*

JEFFREY D. POLLACK*

Thurgood Marshall U.S. Courthouse

Dear Judge Schofield: At the instruction of the United States Court of Appeals for the Second Circuit, Defendant

^{**}ALSO ADMITTED IN FLORIDA

MINTZ & GOLD LLP

ATTORNEYS AT LAW

Hon. Lorna G. Schofield November 13, 2019 Page 2

Nevertheless, Defendant intends to claim errors in the pretrial, trial, and sentencing proceedings in this matter on appeal. However, without the transcripts, counsel cannot provide more details with respect to the specific issues to be raised on appeal or the merits of those claims.

Therefore, we respectfully request that the Court grant Defendant's motion for leave to proceed *in forma pauperis*.

Respectfully submitted,

Roger L. Stavis

Based on Defendant Muratov's and his counsel's affidavits, the application to proceed in forma pauperis on appeal is GRANTED. The Clerk of Court is respectfully directed to close Dkt. No. 564.

Dated: December 16, 2019 New York, New York

United States District Judge